

Joel E. Tasca
Nevada Bar No. 14124
Holly Ann Priest
Nevada Bar No. 13226
BALLARD SPAHR LLP
1980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135
Telephone: (702) 471-7000
Facsimile: (702) 471-7070
tasca@ballardspahr.com
priesth@ballardspahr.com

*Attorneys for Defendant Discover Products
Inc. (erroneously named as "Discover
Bank")*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANDREI GRUIA, an individual,
Plaintiff,

v.

EQUIFAX INFORMATION SERVICES,
LLC, a foreign limited liability company;
EXPERIAN INFORMATION
SOLUTIONS, INC., a foreign corporation;
TRANS UNION, LLC, a foreign limited
liability company; BARCLAYS BANK
DELAWARE, a foreign corporation;
BERLIN-WHEELER, INC., a foreign
corporation; CAPITAL ONE BANK (USA),
N.A., a national banking association;
CHASE BANK USA, N.A., a national
banking association; CITIBANK, N.A., a
national banking association;
CONVERGENT OUTSOURCING, INC., a
foreign corporation; DISCOVER BANK, a
foreign corporation; GRANT & WEBER,
INC., a domestic corporation; NRA
GROUP, LLC dba NATIONAL
RECOVERY AGENCY, a foreign limited
liability company; ONEMAIN FINANCIAL
SERVICES, INC., a foreign corporation;
SYNCHRONY BANK, a foreign
corporation; VERIZON WIRELESS
SERVICES, LLC; a foreign limited liability
company; WEBBANK, a foreign
corporation; WELLS FARGO BANK, N.A.,
a national banking association,

Defendants.

Case No. 2:18-cv-02107-JCM-CWH

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT
DISCOVER PRODUCTS INC.
(ERRONEOUSLY NAMED AS
DISCOVER BANK) TO RESPOND
TO PLAINTIFF'S COMPLAINT**

(First Request)

1 Plaintiff Andrei Gruia ("Plaintiff") and Defendant Discover Products Inc.
2 ("Discover")¹ stipulate and agree that Discover has up to and including December 28,
3 2018 to respond to Plaintiff's Complaint (ECF No. 1), to provide Discover time to
4 investigate Plaintiff's allegations, to evaluate potential settlement, and, if needed, to
5 prepare a response.²

6 This is the first request for an extension, and it is made in good faith and not for
7 purposes of delay.

8 DATED this 26th day of November, 2018.

9 LAW OFFICES OF KEVIN L. HERNANDEZ

BALLARD SPAHR LLP

10 By: /s/ Kevin L. Hernandez

By: /s/ Holly Ann Priest

11 Kevin L. Hernandez
12 Nevada Bar No. 12594
2510 Wigwam Parkway
Suite 206
Henderson, Nevada 89074

Joel E. Tasca
Nevada Bar No. 14124
Holly Ann Priest
Nevada Bar No. 13226
1980 Festival Plaza Drive, Suite 900
Las Vegas, Nevada 89135

13 *Attorneys for Plaintiff in Conjunction*
14 *with the Legal Aid Center of Southern*
15 *Nevada*

Attorneys for Defendant Discover
Products Inc. (erroneously named as
"Discover Bank")

16 **ORDER**

17 IT IS SO ORDERED:

18 
19 UNITED STATES DISTRICT MAGISTRATE
20 JUDGE

21 DATED: November 27, 2018

22
23
24
25
26 ¹ Discover Bank is inadvertently named in the caption.

27 ² By filing this Stipulation, Discover is not waiving any defense, affirmative or
28 otherwise, it may have in this matter.